

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

CHING PING CHEUNG,

Plaintiff,

v.

6213.COM, an Internet domain name, and
JOHN DOE,

Defendants.

Civil Action No. 17-cv-00258-CMH-IDD

PLAINTIFF'S REQUEST FOR CLERK'S ENTRY OF DEFAULT

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff Ching Ping Cheung (“Plaintiff” or “Mr. Cheung”), by counsel, respectfully requests that the Clerk of the Court enter default against the Internet domain name 6213.com for failure to defend the lawsuit. In support of this request, Mr. Cheung states as follows:

1. Mr. Cheung filed his Verified Complaint (“Compl.”) against Defendants on March 6, 2017. *See* ECF No. 1.
2. 6213.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations at the time the Complaint was filed, was improperly registered in the name of “lin jiang nan, Xinglin, xia men shi, fu jian, 361000, cn”. *See* Compl. ¶ 4 & Ex. A.
3. On March 10, 2017, Mr. Cheung provided the registered owner of the 6213.com domain name with notice of the alleged violations and a copy of the Complaint. *See* Declaration

of Ari Meltzer (ECF No. 3-1) ¶ 6 & Attach. 1. The notice was sent to the postal and e-mail addresses provided in the domain name registration records for Defendant 6213.com. *Id.*

4. On March 17, 2017, Mr. Cheung filed a Motion for Service By Publication. *See* ECF Nos. 2-4. March 20, 2017, the Court granted Mr. Cheung's Motion and ordered Mr. Cheung to publish the Order providing notice to the Defendants in *The Washington Post* or *The Washington Times* once within fourteen (14) days after the entry of the Order. *See* ECF No. 5. The Order further directed Mr. Cheung to file a declaration within twenty (20) days after the entry of the Order describing the steps that Mr. Cheung had taken to comply with the Order. *Id.*

5. Mr. Cheung caused the Order of Service By Publication to be published in *The Washington Times* on March 30, 2017. *See* Declaration of Ari Meltzer (ECF No. 6). Mr. Cheung filed his declaration describing compliance with the Order on April 10, 2017. *Id.*

6. In accordance with the Order of Service By Publication, Defendant 6213.com's answer or other response was due no later than April 20, 2017. No such answer or other response has been filed or served. *See* Declaration of David E. Weslow ¶ 6 (May 3, 2017), attached as **Exhibit A** hereto.

WHEREFORE, for the reasons set forth above, Mr. Cheung respectfully requests that the Clerk enter default against Defendant domain name 6213.com as to all claims asserted by Mr. Cheung.

Dated: May 3, 2017

By: /s/ Attison L. Barnes, III /s/
Attison L. Barnes, III (VA Bar No. 30458)
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Counsel for Ching Ping Cheung

CERTIFICATE OF SERVICE

I, Attison L. Barnes, III, hereby certify that on May 3, 2017, I electronically filed the foregoing by using the CM/ECF system. I also sent a copy to the registrant of the domain name at the postal and email address provided by the registrant to the registrar of the 6213.com domain name:

lin jiang nan
Xinglin, xia men shi fu jian 361000 CN
13288666777@163.com

/s/ Attison L. Barnes, III /s/

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